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Attorneys for Plaintiff
 12 UNITED STATES OF AMERICA
 13

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

15 UNITED STATES OF AMERICA,
 16 Plaintiff,
 17 v.
 18 JOSE LUIS HUIZAR, et al.,
 19 Defendants.
 20
 21

No. 2:20-CR-326-JFW-1,2,4,5,6

STIPULATION REGARDING REQUEST FOR
(1) SETTING TRIAL DATE AND
(2) FINDINGS OF EXCLUDABLE TIME
PERIODS PURSUANT TO SPEEDY TRIAL
ACT

CURRENT TRIAL DATE: Vacated
PROPOSED TRIAL DATE: 05/24/2022

22 Plaintiff United States of America, by and through its counsel
 23 of record, the Acting United States Attorney for the Central District
 24 of California and Assistant United States Attorneys Mack E. Jenkins,
 25 Veronica Dragalin, Melissa Mills, and defendants JOSE LUIS HUIZAR,
 26 RAYMOND SHE WAH CHAN, SHEN ZHEN NEW WORLD I, LLC, DAE YONG LEE, and
 27 940 HILL, LLC (collectively, "defendants"), both individually and by
 28

1 and through their respective counsel of record, hereby stipulate as
2 follows:

3 1. The Indictment in this case was filed on July 30, 2020,
4 charging only defendant HUIZAR. Defendant HUIZAR first appeared
5 before a judicial officer of the court in which the charges in this
6 case were pending on June 23, 2020. The Speedy Trial Act, 18 U.S.C.
7 § 3161, originally required that the trial for defendant HUIZAR
8 commence on or before October 8, 2020.

9 2. On August 5, 2020, the Court set a trial date for defendant
10 HUIZAR of September 29, 2020. The Court continued the trial date for
11 defendant HUIZAR from September 29, 2020 to June 22, 2021, and found
12 the interim period to be excluded in computing the time within which
13 the trial must commence, pursuant to the Speedy Trial Act.

14 3. The First Superseding Indictment in this case was made
15 public on December 1, 2020. Defendant CHAN first appeared before a
16 judicial officer of the court in which the charges in this case were
17 pending on December 1, 2020, and the Speedy Trial Act, 18 U.S.C.
18 § 3161, originally required that the trial for defendant CHAN
19 commence on or before February 9, 2021. Defendants LEE and 940 HILL,
20 LLC first appeared before a judicial officer of the court in which
21 the charges in this case were pending on December 7, 2020, and the
22 Speedy Trial Act, 18 U.S.C. § 3161, originally required that the
23 trial for defendants LEE and 940 HILL, LLC commence on or before
24 February 15, 2021. Defendant SHEN ZHEN NEW WORLD I, LLC first
25 appeared before a judicial officer of the court in which the charges
26 in this case were pending on December 14, 2020, and the Speedy Trial
27 Act, 18 U.S.C. § 3161, originally required that the trial for
28

1 defendant SHEN ZHEN NEW WORLD I, LLC commence on or before February
2 9, 2021. Defendant WEI HUANG is currently a fugitive.

3 4. On December 14, 2020, the Court set a trial date of June
4 22, 2021 for defendants CHAN, LEE, 940 HILL, LLC, and SHEN ZHEN NEW
5 WORLD I, LLC.

6 5. On January 27, 2021, pursuant to the parties' stipulated
7 request, the Court vacated the trial date of June 22, 2021 for all
8 defendants, and found the interim period between the initial
9 appearance of defendants CHAN, LEE, 940 HILL, LLC, and SHEN ZHEN NEW
10 WORLD I, LLC and June 22, 2021, to be excluded in computing the time
11 within which the trial must commence, pursuant to the Speedy Trial
12 Act.

13 6. The individual defendants are released on bond pending
14 trial. The government estimates that its case-in-chief, including
15 estimated cross examination, in this matter will last approximately
16 25-30 trial days. At this juncture, the defendants have not
17 determined whether they will present a defense and, if so, how long
18 their case(s) will take. All defendants are joined for trial and a
19 severance has not been granted.

20 7. By this stipulation, defendants move to set a trial date of
21 May 24, 2022, and the parties jointly request to set the following
22 additional dates:

23 a. Pre-trial motions (e.g., motion to dismiss indictment,
24 motion to sever, motion to compel) other than suppression motions,
25 due: October 25, 2021

26 b. Oppositions due: November 22, 2021

27 c. Replies (optional) due: December 16, 2021
28

1 d. Hearing on pre-trial motions, other than suppression
2 motions: January 10, 2022

3 e. Suppression motions due: January 17, 2022

4 f. Oppositions due: February 14, 2022

5 g. Replies (optional) due: February 28, 2022

6 h. Hearing on suppression motions: March 14, 2022

7 i. Motions in limine due: April 11, 2022

8 j. Hearing on motions in limine: April 29, 2022

9 8. Defendants request the May 24, 2022 trial date based upon
10 the following facts, which the parties believe demonstrate good cause
11 to support the appropriate findings under the Speedy Trial Act:

12 a. Defendant HUIZAR is charged with violations of 18
13 U.S.C. § 1962(d) (Racketeer Influenced and Corrupt Organizations
14 Conspiracy); 18 U.S.C. §§ 1341, 1343, 1346 (Honest Services Mail and
15 Wire Fraud); 18 U.S.C. § 1952(a)(3) (Interstate and Foreign Travel in
16 Aid of Racketeering); 18 U.S.C. § 666(a)(1)(B) (Bribery Concerning
17 Programs Receiving Federal Funds); 18 U.S.C. § 1956(a)(1)(B)(i),
18 (a)(2)(B)(i) (Money Laundering); 18 U.S.C. § 1014 (False Statements
19 to a Financial Institution); 18 U.S.C. § 1001(a)(2) (Making False
20 Statements); 31 U.S.C. § 5324(a)(3) (Structuring of Currency
21 Transactions to Evade Reporting Requirements); 26 U.S.C. § 7201
22 (Attempt to Evade and Defeat the Assessment and Payment of Income
23 Tax). Defendant CHAN is charged with violations of 18 U.S.C.
24 §§ 1962(d) (Racketeering Conspiracy), 1343, 1346 (Honest Services
25 Wire Fraud), 666 (Federal Program Bribery), and 1001 (False
26 Statements). Defendant SHEN ZHEN NEW WORLD I, LLC is charged with
27 violations of 18 U.S.C. §§ 1343, 1346 (Honest Services Wire Fraud),
28 1952 (Travel Act violation), and 666 (Federal Program Bribery).

1 Defendants LEE and 940 HILL, LLC are charged with violations of 18
2 U.S.C. §§ 1343, 1346 (Honest Services Wire Fraud), 1519 (Obstruction
3 of Justice), and 666 (Federal Program Bribery).

4 b. By December 1, 2020 (to defendant HUIZAR) and January
5 12, 2021 (to defendants CHAN, SHEN ZHEN NEW WORLD I, LLC, LEE, and
6 940 HILL, LLC), the government produced discovery, including over 1.9
7 million pages of written reports, e-mails, third-party productions,
8 and wire linesheets, over 93,000 files of intercepted wire sessions,
9 including audio and data files. In addition, the productions
10 included extraction reports for over a dozen digital devices, over
11 260 hours of audio recordings in addition to intercepted wire
12 sessions, pen register data for over two dozen phones, GPS phone
13 tracker data for multiple devices, and dozens of pleadings for
14 wiretap applications, search warrants, cell site and GPS warrants,
15 and pen registers. The government produced supplemental discovery to
16 all defendants on March 3, 2021, including over 33,000 pages of
17 reports and third party productions, native reports of defendant
18 HUIZAR's computer and a cooperator's computer, and intercepted wire
19 sessions for defendant CHAN's cellphone and two audio bugs located in
20 defendant CHAN's business office. The government currently
21 anticipates producing additional discovery (including audio
22 recordings of more recently conducted interviews FBI summaries of
23 which were previously produced, and intercepted video and electronic
24 wire data), and will continue to produce discovery that is generated
25 as part of trial preparation during the pendency of this case.

26 c. Due to the nature of the prosecution, including the
27 charges in the indictment and the voluminous discovery produced to
28 defendants, this case is so unusual and so complex that it is

1 unreasonable to expect adequate preparation for pretrial proceedings
2 or for the trial itself within the Speedy Trial Act time limits.

3 d. Due to the limitations of investigating a case of this
4 complexity during the national emergency caused by the COVID-19
5 pandemic, it is unreasonable to expect adequate preparation for
6 pretrial proceedings or for trial itself within the Speedy Trial Act
7 time limits.

8 e. Counsel for defendant HUIZAR, Carel Ale, is presently
9 scheduled to be in the following trials: (1) United States v. James
10 Ball, CR-21-0094-VAP, 04/27/2021, trial estimate 2-3 days, in
11 custody; (2) United States v. Micah Tillmon, CR-20-289-MWF,
12 06/22/2021, trial estimate 2-3 days, on bond; (3) United States v.
13 Remy Navar, CR-20-374-RGK, 06/08/2021, trial estimate 2-3 days, on
14 bond; (4) United States v. Andrew Madi, CR-18-846-PSG, 04/12/2022,
15 trial estimate 4-5 days, on bond; (5) United States v. David DeMulle,
16 CR-15-141-ODW, 11/09/2021, trial estimate 2-3 days, on bond; (6)
17 United States v. William Acosta, CR-20-389-AB, 08/24/2021, trial
18 estimate 2-3 days, on bond; (7) United States v. Christine Luna, CR-
19 19-366-AB, 07/27/2021, trial estimate 2-3 days, on bond; (8) United
20 States v. Jazzmon Russell, CR-17-533-RGK, 08/17/2021, trial estimate
21 2-3 days, in custody; (9) United States v. Kenneth Morris, CR-17-270-
22 JAK, 08/10/2021, trial estimate 2-3 days, on bond. Counsel for
23 defendant HUIZAR, Charles Snyder, is presently scheduled to be in the
24 following trials: (1) United States v. John Ortiz, CR-19-748-RGK,
25 4/26/2021, trial estimate three days, on bond after a year in
26 custody; (2) United States v. Bryan Smith, CR-19-681-AB, 4/27/2021,
27 trial estimate three days, on bond; (3) United States v. Bernard
28 Davis, CR-21-76-ODW, 5/11/2021, trial estimate two days, on bond; (4)

1 United States v. Ramon Lopez-Garcia, CR-19-244-DSF, 5/18/2021, trial
2 estimate four days, in custody; (5) United States v. Abel Garcia, CR-
3 20-225-DSF, 5/18/2021, trial estimate four days, on bond; (6) United
4 States v. Paul Torres, CR-19-490-CAS, 5/25/2021, trial estimate four
5 days, in custody; (7) United States v. Ammarie Nicasio, CR-19-187-
6 FMO, 6/15/2021, trial estimate four days, on bond; (8) United States
7 v. Ricardo Valencia, CR-19-311-MWF, 8/17/2021, trial estimate three
8 days, on bond; (9) United States v. [Sealed], CR-21-54-JFW, 9/7/21,
9 trial estimate three days, on bond; (10) United States v. Jonathan
10 Zuniga, CR-19-635-FMO, 11/9/2021, trial estimate four days, on bond
11 Accordingly, counsel represent that they will not have the time that
12 they believe is necessary to prepare to try this case on the current
13 trial date.

14 f. Counsel for defendant CHAN is presently scheduled to
15 be in the following trials: (1) United States v. Justin Cozart, CR-
16 20-40-DOC, 11/2/21, on bond. Accordingly, counsel represents that he
17 will not have the time that he believes is necessary to prepare to
18 try this case on the current trial date.

19 g. Counsel for defendant SHEN ZHEN NEW WORLD I, LLC is
20 presently scheduled to be in the following trial: United States v.
21 Charley Loh and Simon Chu, CR-19-193-DSF, 06/15/2021, on bond.
22 Accordingly, counsel represents that he will not have the time that
23 he believes is necessary to prepare to try this case on the current
24 trial date.

25 h. Counsel for defendants LEE and 940 HILL, LLC is
26 presently scheduled to be in the following trials: (1) United States
27 v. Weaver, et al., CR 19-527-ODW, 2/15/22, trial estimate 3 weeks;
28 (2) United States v. Michael Lacey, et al., District of Arizona, CR-

1 18-422-PHX-SMB, 8/23/21, trial estimate 3 months; (3) John Bedrosian,
2 et al. v. Mohamed Hadid, et al., Los Angeles Superior Court, Case No.
3 SC129388, 6/1/21, trial estimate 4 weeks.¹ Accordingly, counsel
4 represents that he will not have the time that he believes is
5 necessary to prepare to try this case on the current trial date.

6 i. On March 13, 2020, following the President's
7 declaration of a national emergency in response to COVID-19, the
8 Court entered a General Order suspending jury selection and jury
9 trials scheduled to begin before April 13, 2020. C.D. Cal. General
10 Order No. 20-02, In Re: Coronavirus Public Emergency, Order
11 Concerning Jury Trials and Other Proceedings (Mar. 13, 2020). The
12 Court subsequently continued that suspension through June 1, 2020.
13 C.D. Cal. General Order No. 20-05, In Re: Coronavirus Public
14 Emergency, Further Order Concerning Jury Trials and Other Proceedings
15 (Apr. 13, 2020).

16 j. On March 19, 2020, by Order of the Chief Judge, the
17 Court instituted its Continuity of Operations Plan ("COOP") for the
18 Central District of California, closing all Central District of
19 California courthouses to the public except for hearings on criminal
20 duty matters. C.D. Cal. Order of the Chief Judge No. 20-042 (March
21 19, 2020), In Re: Coronavirus Public Emergency, Activation of
22 Continuity of Operations Plan (Mar. 19, 2020).

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25 ¹ The only associate attorney assisting lead counsel for Mr.
26 Lee and 940 Hill, LLC with this matter is scheduled to be in trial in
27 the matter of *United States v. C'est Toi Jeans, Inc., et al.*, CR-20-
28 0222(A)-ODW, on 4/19/22, with a trial estimate of 15 days. Counsel
for Mr. Lee and 940 Hill do not object to the proposed May 24, 2022
trial date in the instant matter at this time, but note this
potential scheduling difficulty now in the event that counsel needs
to revisit the issue closer to the trial in this case.

1 k. On May 28, 2020, the Court entered General Order 20-
2 08, which extended the activation of the COOP Plan to at least June
3 22, 2020. C.D. Cal. General Order No. 20-08, In Re: Coronavirus
4 Public Emergency, Order Concerning Phased Reopening of the Court (May
5 28, 2020). This extension order also set forth a plan for reopening,
6 which is to occur in three phases. Phase 1 began on June 1, 2020
7 with the return of certain staff to the courthouses to prepare for
8 limited in-court hearings. Phase 2 began no earlier than June 22,
9 2020, with the reopening courthouses for limited in-court hearings.
10 The final phase -- Phase 3 -- contemplates the resumption of jury
11 trials, but a date for commencement of this phase has not been
12 determined.

13 1. On August 6, 2020, the Court entered General Order 20-
14 09, which supersedes General Order 20-08. C.D. Cal. General Order
15 No. 20-09, In Re: Coronavirus Public Emergency, Order Concerning
16 Phased Reopening of the Court. (Aug. 6, 2020). The Order recognizes
17 (1) that "the number of people infected by [COVID-19], continues to
18 grow, with thousands of confirmed cases and deaths in the Central
19 District of California; and (2) the Centers for Disease Control and
20 Prevention and other public health authorities have advised the
21 taking of precautions to reduce the possibility of exposure to the
22 virus and slow the spread of the disease, including implementing
23 physical distancing and reducing the size of in-person gatherings."
24 Id. at 1. The Order further states that it was issued "[u]pon a
25 majority vote, in order to protect public health, and in order to
26 reduce the size of public gatherings and reduce unnecessary travel."
27 Among other things, the Order adopts "gating criteria" that will be
28 used to inform when the Court transitions to Phase 3. Id. at 1-2.

1 With certain exceptions, the courthouses will be closed to the
2 public, and, until further notice, no jury trials will be conducted
3 in criminal cases. Id. at 2-3. In connection with the continued
4 suspension of criminal jury trials, the Court made the following
5 findings:

6 The Center for Disease Control and Prevention has warned that
7 "in the coming months, most of the U.S. population will be
8 exposed to this virus." The COVID-19 rates of infection,
9 hospitalizations and deaths have significantly increased in the
10 Central District of California in the last thirty days such that
11 holding jury trials substantially increases the chances of
transmitting the Coronavirus. The Court concludes that
conducting jury trials would also likely place prospective
jurors, defendant, attorneys, and court personnel at unnecessary
risk.

12 Id. Regarding the Speedy Trial Act, the Court found that "suspending
13 criminal jury trials in the Central District of California because of
14 the increase in reported COVID-19 infections, hospitalizations, and
15 deaths serves the ends of justice and outweigh[s] the interests of
16 the public and the defendants in a speedy trial." Id. (emphasis
17 added). To date, no jury summons for trials are outstanding, and it
18 is unclear when such summons will be issued, when jury trials will
19 resume, and what the Court's capacity will be for conducting them
20 once they do resume.

21 m. On December 7, 2020, the Chief Judge entered Order of
22 the Chief Judge No. 20-179, noting that "since the Court implemented
23 [certain] emergency procedures, there recently has been an
24 unprecedented surge of COVID-19 cases, hospitalizations, and test
25 positivity rates in the Central District." C.D. Cal. Order of the
26 Chief Judge No. 20-179, In Re: Coronavirus Public Emergency,
27 Activation of Continuity of Operations Plan at 1 (Dec. 7, 2020). The
28 Order further notes that California's "regional stay-at-home order

1 went into effect in the Southern California region, which includes
2 the entire Central District, on December 6, 2020 because ICU
3 availability in the region has fallen below 15%." Id. at 2. The
4 Order further states that the COOP Plan for the Central District of
5 California is effective from December 9, 2020 through and including
6 January 8, 2021, during which time jury trials remain suspended. Id.
7 at 3.

8 n. On December 17, 2020, the Chief Judge extended all
9 findings and authorizations in Order of the Chief Judge No. 20-043
10 for an additional 90 days. C.D. Cal. Order of the Chief Judge No.
11 20-186, In Re: Coronavirus Public Emergency (Dec. 17, 2020).

12 o. On January 6, 2021, the Chief Judge extended the COOP
13 Plan through and including January 29, 2021, during which time jury
14 trials remain suspended. C.D. Cal. Order of the Chief Judge No. 21-
15 002, In Re: Coronavirus Public Emergency, Activation of Continuity of
16 Operations Plan (Jan. 6, 2021). The order noted that "COVID-19
17 cases, hospitalizations, and test positivity rates in the Central
18 District have continued to increase," that "ICU availability in the
19 Southern California ... is currently at 0.0%" and that "the State's
20 regional stay-at-home order remains in effect in the Southern
21 California region." Id. at 1.

22 p. In addition to the Court's orders, both California
23 Governor Gavin Newsom and Los Angeles Mayor Eric Garcetti have issued
24 emergency orders requiring residents to stay home, subject to limited
25 exceptions.

26 q. Official public health guidance continues to evolve on
27 a near daily basis.

1 r. In light of the foregoing, counsel for defendants also
2 represent that additional time is necessary to confer with
3 defendants, conduct and complete an independent investigation of the
4 case, conduct and complete additional legal research including for
5 potential pre-trial motions, review the discovery and potential
6 evidence in the case, and prepare for trial in the event that a
7 pretrial resolution does not occur. Defense counsel represent that
8 failure to grant the continuance would deny them reasonable time
9 necessary for effective preparation, taking into account the exercise
10 of due diligence.

11 s. Defendants believes that failure to grant the
12 continuance will deny each of them continuity of counsel and adequate
13 representation.

14 t. The government does not object to the continuance.

15 u. The requested continuance is not based on congestion
16 of the Court's calendar, lack of diligent preparation on the part of
17 the attorney for the government or the defense, or failure on the
18 part of the attorney for the government to obtain available
19 witnesses.

20 9. For purposes of computing the date under the Speedy Trial
21 Act by which defendants' trial must commence, the parties agree that
22 the time period of June 22, 2021 to May 24, 2022, inclusive, should
23 be excluded pursuant to 18 U.S.C. §§ 3161(h)(7)(A), (h)(7)(B)(i),
24 (h)(7)(B)(ii) and (h)(7)(B)(iv) because the delay results from a
25 continuance granted by the Court at defendants' request, without
26 government objection, on the basis of the Court's finding that: (i)
27 the ends of justice served by the continuance outweigh the best
28 interest of the public and defendants in a speedy trial; (ii) failure

1 to grant the continuance would be likely to make a continuation of
2 the proceeding impossible, or result in a miscarriage of justice;
3 (iii) the case is so unusual and so complex, due to the nature of the
4 prosecution, and the limitations the ongoing COVID-19 pandemic places
5 on the defense's ability to investigate the case and prepare for
6 trial, that it is unreasonable to expect preparation for pre-trial
7 proceedings or for the trial itself within the time limits
8 established by the Speedy Trial Act; and (iv) failure to grant the
9 continuance would unreasonably deny defendants continuity of counsel
10 and would deny defense counsel the reasonable time necessary for
11 effective preparation, taking into account the exercise of due
12 diligence.

13 10. Nothing in this stipulation shall preclude a finding that
14 other provisions of the Speedy Trial Act dictate that additional time
15 periods be excluded from the period within which trial must commence.

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Moreover, the same provisions and/or other provisions of the Speedy Trial Act may in the future authorize the exclusion of additional time periods from the period within which trial must commence.


IT IS SO STIPULATED.

Dated: March 29, 2021

Respectfully submitted,

TRACY L. WILKISON
Acting United States Attorney


BRANDON D. FOX
Assistant United States Attorney
Chief, Criminal Division



MACK E. JENKINS
VERONICA DRAGALIN
MELISSA MILLS
Assistant United States Attorneys

Attorneys for Plaintiff
UNITED STATES OF AMERICA

1 I am JOSE LUIS HUIZAR's attorney. I have carefully discussed
2 every part of this stipulation and the continuance of the trial date
3 with my client. I have fully informed my client of his Speedy Trial
4 rights. To my knowledge, my client understands those rights and
5 agrees to waive them. I believe that my client's decision to give up
6 the right to be brought to trial earlier than May 24, 2022 is an
7 informed and voluntary one.

8 
9 CAREL ALE
CHARLES SNYDER
10 Deputy Federal Public Defenders
Attorneys for Defendant
11 JOSE LUIS HUIZAR
12

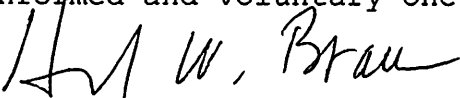
March 30, 2021
Date

13 I have read this stipulation and have carefully discussed it
14 with my attorney. I understand my Speedy Trial rights. I
15 voluntarily agree to vacate the current trial date, and give up
16 my right to be brought to trial earlier than May 24, 2022.

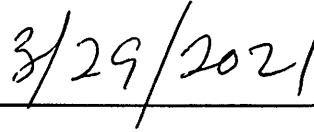
17 
18 JOSE LUIS HUIZAR
19 Defendant
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03/30/21
Date

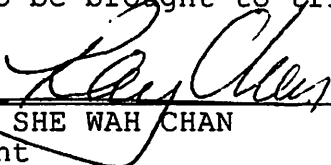
1 I am RAYMOND CHAN's attorney. I have carefully discussed every
2 part of this stipulation and the continuance of the trial date with
3 my client. I have fully informed my client of his Speedy Trial
4 rights. To my knowledge, my client understands those rights and
5 agrees to waive them. I believe that my client's decision to give up
6 the right to be brought to trial earlier than May 24, 2022 is an
7 informed and voluntary one.

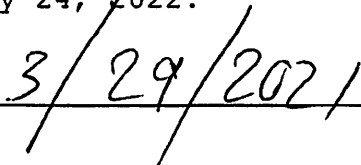
8 

9 HARLAND W. BRAUN
10 Attorney for Defendant
RAYMOND CHAN


Date

11
12 I have read this stipulation and have carefully discussed it
13 with my attorney. I understand my Speedy Trial rights. I
14 voluntarily agree to vacate the current trial date, and give up my
15 right to be brought to trial earlier than May 24, 2022.

16 
17 RAYMOND SHE WAH CHAN
18 Defendant


Date

1 I am SHEN ZHEN NEW WORLD I, LLC's attorney. I have carefully
2 discussed every part of this stipulation and the continuance of the
3 trial date with my client. I have fully informed my client of its
4 Speedy Trial rights. To my knowledge, my client understands those
5 rights and agrees to waive them. I believe that my client's decision
6 to give up the right to be brought to trial earlier than May 24, 2022
7 is an informed and voluntary one.

8 

9 RICHARD M. STEINGARD
10 Attorney for Defendant
11 SHEN ZHEN NEW WORLD I, LLC

March 29, 2021

Date

12 I have read this stipulation and have carefully discussed it
13 with my attorney. I understand my Speedy Trial rights. I
14 voluntarily agree to vacate the current trial date, and give up my
15 right to be brought to trial earlier than May 24, 2022.


16 

17 On behalf of
18 SHEN ZHEN NEW WORLD I, LLC
19 Defendant

March 29, 2021

Date

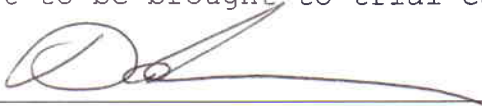
1 I am DAE YONG LEE's and 940 HILL, LLC's attorney. I have
 2 carefully discussed every part of this stipulation and the
 3 continuance of the trial date with my clients. I have fully informed
 4 my clients of their Speedy Trial rights. To my knowledge, my clients
 5 understands those rights and agree to waive them. I believe that my
 6 clients' decision to give up the right to be brought to trial earlier
 7 than May 24, 2022 is an informed and voluntary one.

8 
 9 ARIEL A. NEUMAN
 10 Attorney for Defendants
 11 DAE YONG LEE and 940 HILL, LLC

March 30, 2021

Date

12 I have read this stipulation and have carefully discussed it
 13 with my attorney. I understand my Speedy Trial rights. I
 14 voluntarily agree to vacate the current trial date, and give up my
 15 right to be brought to trial earlier than May 24, 2022.

16 
 17 DAE YONG LEE, in his individual
 18 capacity as a defendant and as
 19 representative for defendant 940
 20 HILL, LLC

3-30-21
 Date

CERTIFICATION OF INTERPRETER

21 I, WILLIAM HONG, am fluent in the written and
 22 spoken English and Korean languages. I accurately translated this
 23 entire agreement from English into Korean to defendant DAE YONG LEE
 24 on this date.

25 
 26 INTERPRETER

3/30/21
 Date